REMARKS

Applicant requests favorable reconsideration and allowance of this application in view of the foregoing amendments and the following remarks.

Claims 1-5, 7-9, 13, 14, 16, 17, 19-32, 34-36, 40, 41, 43, 44, and 46-56 are now pending in the application, with Claims 1, 28, 55 and 56 being independent. Claims 6, 10-12, 15, 18, 33, 37-39, 42 and 45 have been cancelled without prejudice.

Claims 1-5, 7-9, 13, 14, 16, 17, 19-22, 28-32, 34-36, 40, 41, 43, 44, and 46-49 have been amended and Claims 55 and 56 have been added. Applicant submits that support for the amendments can be found in the original disclosure, and therefore no new matter has been added.

Claims 1, 2, 4-7, 10-24, 28, 29, 31-34, and 37-51 stand rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,191,808 (Katayama et al. '808). Applicant respectfully traverses this rejection for the reasons discussed below.

As recited in independent Claim 1, the present invention includes, *inter alia*, the features of updating detection parameters for detecting specific points on a target image photographed by first photographing means that is movable, based on an image photographed by second photographing means whose position and orientation are known, and detecting the positions of the specific points on the target image based on the updated detection parameters. With these features, because detection parameters can be updated adequately as an external environment changes, specific points can be detected on a photographed image with high-accuracy even if the external environment changes. Independent Claims 28, 55, and 56 recite similar features.

Applicant submits that the cited art fails to disclose or suggest at least the above-mentioned features. Katayama et al. '808 discloses generating an image from an arbitrary viewpoint using a multi-viewpoint image database that holds images from a plurality of different viewpoints. According to that patent, element 2 of Fig. 1 is a viewpoint detector that detects a position of the user's eyes watching the display screen, a viewpoint parameter calculating portion 7 calculates the viewpoint parameter based on the detected position of the user's eyes, and an image is generated from that viewpoint using the viewpoint parameter. However, that patent does not disclose or suggest at least the feature of updating detection parameters based on an image photographed by second photographing means whose position and orientation are known. The other cited art is not understood to teach these features or otherwise remedy the aforementioned deficiencies of Katayama et al. '808.

For the foregoing reasons, Claims 1, 28, 55, and 56 are believed to be patentable over the art of record. The dependent claims are patentable for at least the same reasons, as well as for the additional features they recite.

In view of the foregoing, Applicant submits that this application is in condition for allowance. Favorable reconsideration, withdrawal of the rejection set forth in the above-mentioned Office Action, and an early Notice of Allowance are requested.

Applicant's undersigned attorney may be reached in our Washington, DC office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

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